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15	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO/O	OAKLAND DIVISION	
17	HECTOR RIOJAS and ST. MARY'S) CENTER,)	Case No.: 15-cv-03592	
18	Plaintiffs,	STIPULATION FOR ENLARGEMENT OF TIME PURSUANT TO LOCAL RULES 6-2	
19	v.)	AND 54-5	
20	UNITED STATES DEPARTMENT OF	[PROPOSED] ORDER	
21	AGRICULTURE, TOM VILSACK, Secretary, United States Department of Agriculture, and		
22	WILL LIGHTBOURNE, Director, California) Department of Social Services.		
23	Defendants.		
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28	Stipulated Motion to Extend Dates and [Proposed] Order, Riojas v. USDA, 15-cv-03592		
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Stipulated Motion to Extend Dates and [Proposed] Order, Riojas v. USDA, 15-cv-03592

DATED: July 25, 2016

Respectfully submitted,

/s/ Elise Stokes

ELISE STOKES, State Bar #288211

STIPULATION

Pursuant to Local Rules 6-2 and 54-5, Plaintiff Hector Riojas, Federal Defendants United States Department of Agriculture and Tom Vilsack, Secretary, United States Department of Agriculture, and State Defendant Will Lightbourne, Director, California Department of Social Services, stipulate and agree to an enlargement of time for Plaintiff to file a motion for attorneys' fees.

On June 30, 2016, the Court granted Plaintiff's Motion for Summary Judgment and denied both Defendants' Motions for Summary Judgment. ECF 52. As of the filing of this stipulation, judgment has not been entered pursuant to Federal Rule of Civil Procedure 58.

Plaintiff requests an enlargement of time to file his motion for attorneys' fees to give the parties sufficient time to meet and confer as required by Local Rule 54-5; and to provide sufficient time to file the motion if that becomes necessary. Plaintiff has not made any previous requests for an enlargement of time to file a fee motion. Counsel for the parties have conferred on these matters and hereby stipulate and agree as follows:

- (1) Plaintiff may file his motion for attorney's fees no later than 60 days after the court's entry of judgment;
- (2) Defendants may file their opposition to any motion for attorneys' fees no later than 30 days thereafter, and;
- (3) Plaintiff may file his reply brief no later than 14 days thereafter.

Accordingly, the parties respectfully request that the Court give effect to this stipulation extending the timeline for any motion for attorneys' fees in this matter as set forth herein.

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26		SUSAN M. CARSON
27	Stipulated Motion to Extend Dates and [Proposed]	Supervising Deputy Attorney General
28	Order, Riojas v. USDA, 15-cv-03592	/s/ Hadara R. Stanton

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[PROPOSED]-ORDER

Pursuant to stipulation and good cause appearing, the Court hereby approves the Parties' Stipulation to Enlarge Time and orders as follows:

- (1) Plaintiff Hector Riojas may file a Motion for Attorney's Fees 60 days after Entry of Judgment;
 - (2) Defendants may file their opposition to any motion for attorneys' fees no later than 30 days thereafter, and;
 - (3) Plaintiff may file his reply brief no later than 14 days thereafter.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 27, 2016



Stipulated Motion to Extend Dates and [Proposed] Order, Riojas v. USDA, 15-cv-03592